

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

MARGARET P. BYERS AND MICHAEL C.
BYERS, CO-ADMINISTRATORS OF THE
ESTATE OF CHARLES M. BYERS,
DECEASED,

Plaintiff,

v.

Case No. 3:23-cv-00801-RCY

CITY OF RICHMOND, CHIPPENHAM &
JOHNSTON-WILLIS HOSPITALS, INC.,
STEVEN M. GIBSON, DAVID R. HYDE,
JR., AND JOHN/JANE DOE SECURITY
GUARDS (1 - 5),

Defendant.

JOINT MOTION TO MODIFY AMENDED PROTECTIVE ORDER FOR RECORDS

COME NOW Plaintiffs Margaret P. Byers and Micheal C. Byers, Co-Administrators of the Estate of Charles M. Byers, deceased (“Plaintiffs”) and the City of Richmond, Chippenham & Johnston-Willis Hospitals, Inc., Steven M. Gibson, and David R. Hyde, Jr., R.N. (“Defendants”) (collectively, “Parties”), by counsel, and move this Court for an Order modifying the Amended Protective Order for Records (ECF No. 65-1) for the reasons set forth in their Memorandum in Support of Joint Motion to Modify Amended Protective Order for Records.

**CHIPPENHAM & JOHNSTON-
WILLIS HOSPITALS, INC. AND
DAVID R. HYDE, JR.**

By Counsel

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C E R T I F I C A T E

I hereby certify that on the 24th day of June, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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and I hereby certify that I have emailed the document to the above.

/s/

John R. Owen